REMARKS

I. INTERVIEW SUMMARY

Applicants appreciate the courtesy extended by the Examiner in holding a telephone interview with the undersigned on 12/28/07.

Agreed conclusions of the interview were the following: 1) Claim 24 is distinguished over Chan in that claim 24 recites the comparing/determining step performed by the **server**, whereas in Chan this step is performed by the **client device** (which Chan calls "remote site").[1] 2) Claim 24 would be further distinguished from Chan if it were amended to require the method steps to be formed in the order recited. 3) Claim 24 is distinguished over Mori at least in that Mori lacks the claimed step of the server storing a list, for each client device, of what fonts the respective device has structure data for.[2]

II. INDEPENDENT CLAIM 24

In accordance with the telephone interview, claim 24 is herein amended to specify that the steps are performed in the order recited. Claim 24 is distinguished over the cited references to Chan and Mori on the following grounds, numbered A-D:

A. The references lack a storing step performed by the server as claimed

In claim 24, the server stores, for each client device, a font capabilities list. This is a list of fonts for which the respective client device has font structure data needed to render text. In contrast, Chan's server does NOT store such a list for each client device; nor would it have any reason to, since Chan's server never makes use of such a list. Mori's server, also, does not store such as list, as the Examiner agreed in the phone interview (item 3 above).

B. The references lack a comparing step performed by the SERVER as claimed

The comparing step of claim 24 is performed by the **server**, whereas Chan's comparing step[3] is performed by the **client device**, as the Examiner agreed in the phone interview[1].

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[1] as confirmed in Examiner's Interview Summary (issued 1/2/08), continuation sheet, par. 2

[2] ibid., par. 3

[3] which the last Office Action equates to the claimed comparing step

Specifically, in claim 24, the **server "compares"** font identifiers (of text addressed to a designated client device) to the font capabilities list of the designated device. The server does this to determine which font identifiers the designated device lacks font structure data for. In contrast, in Chan, the comparing step is performed by the **client device** itself [4], which then informs the server what fonts it needs structure data for.

C. The references lack a comparing step performed BEFORE the text is transferred to the client as claimed

Claim 24 recites steps performed in the following order: First, the server **receives** text with font identifiers addressed to a designated client device. Then, the server **compares** the font identifiers to the font capabilities list of the client devise (to determine the fonts for which the client device lacks structure data). Then, the server **transfers** the text to the designated client device. The claimed comparing step is thus performed BEFORE the text is transferred to the client device.

In contrast, in Chan, the comparing is performed only AFTER the text is transferred to the client device, as explained by Chan (abstrast[4] and col. 3, line 62 – col. 4, line 9)

D. The references lack a comparing step performed on a list stored by the SERVER

In claim 24, the server compares font identifiers (for text addressed to a client device) to a list (of the client device's font capabilities) that is **stored on the server**. In contrast, in Chan, the font identifiers are compared to a list (of the client device's font capabilities) that is **stored on the client device.**

E. Summary regarding claim 24

In summary, per item A above, the references lack the claimed storing by a server. Per items B-D above, the claimed comparing step differs from Chan's comparing step[3] in terms of **what** performs it (server vs. client device), **when** it's performed (before forwarding text to client device vs. after forwarding text to client device), and **on what** it's performed (capabilities list stored on server vs. capabilities list stored on client device). Therefore, on several grounds, claim 24 is patentable over the cited prior art.

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[4] as Chan's abstract states, with explanation in brackets added by Applicants:
"When [after] a document is transmitted [by a server] from the site of its creation to a remote site [client device], the computer at the remote site [client device] first determines whether information pertaining to all of the fonts contained in the document is stored at the remote site."

III. NEW INDEPENDENT CLAIM 31

New independent claim 31 recites the subject matter of dependent claim 26, including the following steps performed in the following order: (i) The server **stores** a font capabilities list for each client device. (ii) The server **receives** text with font structure data, addressed to a designated client device. (iii) The server **determines**, from the designated device's capabilities list (which is stored on the server), whether the designated device already has the font structure data. (iv) The server **transfers** the text to the designated device, but **operatively refrains** from transferring the font structure data to the device in response to determining, in step iii, that the device already has the font structure data.

Claim 31 is patentable over the references of record to Chan and Mori, because claim 31 includes all the limitations that (as explained above) render claim 24 patentable over the references. Specifically: The references lack the claimed storing step (i), because neither reference's server **stores** the font capabilities list for each client device[5]. The references further lack the claimed determining step (iii), since Chan's determining step is not performed **by the server** as claimed (but instead **by the client device**)[6], and is not performed **before** the text is forwarded to the client device as claimed (but instead only **after** the text is forwarded to the client device)[7], and is not based on a capabilities list **stored on the server** as claimed (but instead based on a capabilities list **stored in the client device**)[8].

Claim 31 is even further distinguished from the references by the limitation in step (iv) of the server "operatively refraining" from forwarding, to the client device, font structure data that was received by the server and addressed to the designated client device for the server to forward to that client device. Even page 7 of the Office Action, which addresses this limitation in claim 26, fails to cite anything in the references where the server receives font data structure addressed to the client device, much less "operatively refraining" from forwarding it on to the client device as claimed.

Therefore, on several grounds, claim 31 is patentable over the prior art of record.

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[5] as explained above in section A
[6] as explained above in section B
[7] as explained above in section C
[8] as explained above in section D

IV. NEW INDEPENDENT CLAIM 34

New independent claim 34 recites the subject matter of dependent claim 28, including the following steps performed in the following order: (i) The server **stores** a font capabilities list for each client device. (ii) The server **receives** text with font structure data, addressed to a designated client device. (iii) The server **determines** which of the text's font identifiers are "not found" in the designated device's font capabilities list. (iv) The server determines whether another font identifier exists that is the same as the "not found" font identifier.

Claim 34 is patentable over the references of record to Chan and Mori, because claim 34 includes all the limitations that (as explained above) render claim 24 patentable over the references. Specifically: The references lack the claimed storing step (i), because neither reference's server **stores** the font capabilities list for each client device[9]. The references further lack the determining step (iii), since Chan's determining step is not performed **by the server** as claimed (but instead **by the client device**)[10], and is not performed **before** the text is forwarded to the client device as claimed (but instead only **after** the text is forwarded to the client device)[11], and is not based on a capabilities list **stored on the server** as claimed (but instead based on a capabilities list **stored in the client device**)[12].

Claim 34 is yet further distinguished over the references by the limitation in step (iv) of determining whether another font identifier exists that is the same as the "not found" font identifier.

Therefore, on several grounds, claim 34 is patentable over the prior art of record.

V. NEW INDEPENDENT CLAIM 40

New independent claim 40 recites the subject matter of dependent claim 27, including the following steps performed in the following order: (i) The server **stores** a font capabilities list for each client device. (ii) The server **receives** text and font structure data (for rendering the text) addressed to a designated client device. (iii) The server **determines** which of the text's font identifiers are "not found" in the designated device's font capabilities list. (iv) The server determines whether another font identifier exists that is the same as the "not found" font identifier.

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[9] as explained above in section A
[10] as explained above in section B
[11] as explained above in section C
[12] as explained above in section D

Claim 40 is patentable over the references of record to Chan and Mori, because claim 40 includes all the limitations that (as explained above) render claim 24 patentable over the references. Specifically: The references lack the claimed storing step (i), because neither reference's server **stores** the font capabilities list for each client device[13]. The references further lack the determining step (iii), since Chan's determining step is not performed **by the server** as claimed (but instead **by the client device**)[14], and is not performed **before** the text is forwarded to the client device as claimed (but instead only **after** the text is forwarded to the client device)[15], and is not based on a capabilities list **stored on the server** as claimed (but instead based on a capabilities list **stored in the client device**)[16].

Claim 40 is yet further distinguished over the references by the limitation in step (iv) of requesting and receiving font structure data for the "not found" font identifier from another server.

Therefore, on several grounds, claim 34 is patentable over the prior art of record.

VI. DEPENDENT CLAIMS 25-30, 32-33, 35-39 and 41-42

The remaining claims depend from base claims that are patentable over the prior art as explained above. The limitations that the dependent claims add to the base claims distinguish them further from the prior art. Therefore, the dependent claims also are patentable.

The application is therefore now be in condition for allowance, and allowance is requested.

Respectfully submitted,

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[13] as explained above in item A
[14] as explained above in item B
[15] as explained above in item C
[16] as explained above in item D